

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION - DETROIT**

IN THE MATTER OF:

GARY M. MICIK
TONI M. MICIK,

Debtors.

7221 Cooper Creek Drive
Ypsilanti, MI 48197
XXX-XX-2576
XXX-XX-2050

Case No. 19-43277-TJT
Honorable THOMAS J. TUCKER
Chapter 13

**OBJECTIONS TO CONFIRMATION OF PROPOSED CHAPTER 13 PLAN
ON BEHALF OF FORD MOTOR CREDIT COMPANY LLC**

Creditor Ford Motor Credit Company LLC (“Objector”) by and through counsel, KILPATRICK & ASSOCIATES, P.C., states:

1. The Debtors (“Debtor” as used herein shall include both Debtors in a joint case) filed a voluntary Chapter 13 petition on March 7, 2019.
2. On the Petition Date the Debtor was indebted to Objector in the amount of \$4,686.13 (plus interest, fees and costs) and in possession of the following: 2017 Ford F-150 Series (VIN: 1FTEX1EP6HFA85321) (Acct. No.: 9782) (the “Vehicle”).
3. The Vehicle listed in Paragraph 2 was leased under a Vehicle Lease Agreement (the “Lease”).
4. The Proposed Plan cannot be confirmed for the following reasons:
 - a) The Proposed plan fails to provide for treatment of the Vehicle or the debt related thereto.
 - b) The Proposed Plan fails to provide for surrender of the Vehicle or Relief from the Automatic Stay at Lease maturity. The Lease matures on May 19, 2020, at which time, the Debtor’s interest in the Vehicle ends and the Debtor has no right to retain possession, thereafter.
 - c) The Debtor has failed to demonstrate the Vehicle is insured pursuant to 11 U.S.C. §1326(a) (4).

WHEREFORE, Ford Motor Credit Company LLC requests the Court to deny confirmation of the Proposed Plan, and to grant such other relief as may be appropriate and just.

Respectfully submitted,

KILPATRICK & ASSOCIATES, P.C.

By: /s/ MICHAEL T. BROWN

RICHARDO I. KILPATRICK, ESQ. (P35275)

MICHAEL T. BROWN, ESQ. (P71385)

Attorneys for Creditor, Ford Motor Credit Company LLC

903 North Opdyke Road, Suite C

Auburn Hills, MI 48326

ecf@kaalaw.com

(248) 377-0700

Dated: March 26, 2019